

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Rodney J. Fitch,  
  
Plaintiff,  
  
v.  
  
Americredit Financial Services, Inc., a  
foreign corporation, dba GM Financial,  
  
Defendant.

Case No. 2:21-cv-00963-JCM-NJK

**ORDER TO EXTEND  
TIME TO ANSWER OR OTHERWISE  
PLEAD  
(FIRST REQUEST)**

Pursuant to Local Rule IA 6-1 of the United States District Court for the District of Nevada, Defendant Americredit Financial Services, Inc. dba GM Financial (“Defendant”) and Plaintiff Rodney J. Fitch (“Plaintiff”), by and through their respective counsel, (collectively the “Parties”) hereby stipulate as follows:

1. Plaintiff filed his Complaint on April 14, 2021;
2. Defendant was served with the Complaint on April 19, 2021;
3. Defendant removed this matter on May 19, 2021;
4. Defendant’s deadline to answer or respond to Plaintiff’s Complaint is May 26, 2021;
5. Defendant has requested, and Plaintiff has consented to, an additional five (5) days for Defendant to file an Answer or otherwise respond to the Complaint;

1           6.       An additional five (5) days for Defendant to answer or respond to Plaintiff's  
2 Complaint will not alter the date of any event or deadline already fixed by the Court or prejudice  
3 any party;

4           7.       Good cause exists to grant the stipulation as the additional five (5) days are needed  
5 to allow Defendant to complete its investigation of Plaintiff's allegations, including a review of  
6 all relevant documents;

7           8.       Pursuant to Civil Local Rules 6.2 and 7.1, Plaintiff and Defendant agree that  
8 Defendant shall have up to and including May 31, 2021 to file a responsive pleading to Plaintiff's  
9 Complaint.

10          9.       WHEREAS, this is the first request by the Parties seeking such extension;  
11         THEREFORE, in consideration of the foregoing, and for good cause, IT IS HEREBY  
12 STIPULATED AND AGREED by and between the Parties as follows:

13         Defendant Americredit Financial Services, Inc. dba GM Financial shall have up to and  
14 including May 31, 2021 to file an Answer or Otherwise Plead to Plaintiff's Complaint.

15         **IT IS SO STIPULATED.**

16         Dated this 20<sup>th</sup> day of May 2021.

17 CROSBY & FOX, LLC

LEWIS ROCA ROTHBERGER CHRISTIE LLP

18 By: /s/ David M. Crosby

By: /s/ J Christopher Jorgensen

19 David M. Crosby, Esq.  
20 Nevada Bar No. 3499  
21 601 South Tenth Street  
Las Vegas, NV 89101

J Christopher Jorgensen, Esq.  
Nevada Bar No. 8352  
3993 Howard Hughes Pkwy, Suite 600  
Las Vegas, NV 89169

22 *Attorney for Plaintiff*  
23 *Rodney J. Fitch*

*Attorney for Defendant Americredit*  
*Financial Services, Inc. dba GM Financial*

24 **IT IS ORDERED.**

25   
26 United States Magistrate Judge

27 DATED: May 21, 2021